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Attorneys for Plaintiffs,
KEITH H. WASHINGTON,
SAN FRANCISCO BAY VIEW
NATIONAL BLACK NEWSPAPER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

KEITH H. ("MALIK") WASHINGTON, an
individual; and SAN FRANCISCO BAY
VIEW NATIONAL BLACK NEWSPAPER,
a California corporation,

Plaintiffs,

vs.

FEDERAL BUREAU OF PRISONS, a
public agency of the United States; THE
GEO GROUP, INC., a Florida corporation,
dba GEO CALIFORNIA, INC.; MONICA
HOOK, an individual; MARIA RICHARD,
an individual; WILL GOMEZ, an
individual, MURTALA LANVAL, an
individual, and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 4:21-cv-00787-JST

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER AND/OR ORDER TO SHOW
CAUSE AND FOR PRELIMINARY
INJUNCTION**

Having considered all material filed in support of and in opposition to
Plaintiffs' Application for a Temporary Restraining Order and/or Order to Show

Washington v. Federal Bureau of Prisons, Case No. 4:21-cv-00787-JST
[Proposed] Order Granting Plaintiffs' Application for a Temporary Restraining Order
and/or Order to Show Cause for Preliminary Injunction

1 Cause for Preliminary Injunction, and having considered the arguments of counsel,
2 and good cause appearing:

3 IT IS HEREBY ORDERED that Plaintiffs' Application for a Temporary
4 Restraining Order and/or Order to Show Cause for Preliminary Injunction is
5 GRANTED.

6
7 Defendants and all persons acting with them or under their control are ordered
8 to:

- 9 1. Revoke the disciplinary sanction against Mr. Washington, Report No.
10 3466318, and remove the sanction from Mr. Washington's record;
11 2. Restore Mr. Washington's good time credits (14 days), which have
12 delayed his expected date for home confinement and expected release date;
13 3. Revoke the disciplinary charges arising from the incident report of
14 February 4, 2021.

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16 Defendants are further enjoined from bringing disciplinary charges against
17 Keith H. "Malik" Washington based on the following conduct:

- 18
19 1. Performing work, pursuant to his BOP-approved employment, outside of
20 the SF Bay View offices or the Hope House;
21 2. Speaking to staff at the SF Bay View;
22 3. Speaking to other members of the press;
23 4. Reporting and making presentations on the radio or social media;
24 5. Speaking at rallies and demonstrations and holding a press conference in
25 his capacity as the Editor-in-Chief of the SF Bay View.

26
27 IT IS FURTHER ORDERED that Defendants show cause before this Court at
28 _____, United States Courthouse, the Northern District

of California, on the _____ day of _____, 2021 at _____ o'clock
 __.m., or such other date as may be fixed by the Court, why a preliminary injunction,
 pursuant to Rule 65 of the Federal Rules of Civil Procedure, should not be issued
 ordering the Defendants, and all persons acting with them or under their control,
 pending the final hearing and determination of this action, to :

1. Revoke the disciplinary sanction against Mr. Washington, Report No. 3466318, and remove the sanction from Mr. Washington's record;
2. Restore Mr. Washington's good time credits (14 days), which have delayed his expected date for home confinement and expected release date;
3. Revoke the disciplinary charges arising from the incident report of February 4, 2021.

Defendants shall also show cause before this Court at the aforementioned location and time why a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, should not be issued enjoining the Defendants, and all persons acting with them or under their control, pending the final hearing and determination of this action, from bringing disciplinary charges against Keith H. "Malik" Washington based on the following conduct:

1. Performing work, pursuant to his BOP-approved employment, outside of the SF Bay View offices or the Hope House;
2. Speaking to staff at the SF Bay View;
3. Speaking to other members of the press;
4. Reporting and making presentations on the radio or social media;
5. Speaking at rallies and demonstrations and holding a press conference in his capacity as the Editor-in-Chief of the SF Bay View.

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2 IT IS SO ORDERED.
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4 Dated:
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Hon. Jon S. Tigar
United States District Judge
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